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CAMPAIGN FINANCE DIVISION

☒ WAIVER REQUEST
☐ RECONSIDERATION REQUEST

DATE: 7/8/2021
DOCKET #:

FILER INFORMATION

Name: Gregory Rome
Office: District Judge, 34th Judicial District Court, Division D
Parish: ST. BERNARD
Election Date: 11/6/2018
Level of Office: District

REPORT INFORMATION

Name of Report: SUPP 2019
Original Due Date: 2/18/2020
Date Filed: 5/4/2020
Activity Receipts: \$-0
Expenditures: \$180
Funds at Close of Reporting Period: \$623.45

LATE FEE INFORMATION

Amount of Late Fee: \$600
Days Late: 76
Late Fee Order Received: 9/29/2020
Payment/Waiver Request Due Date: 10/29/2020
Waiver Request Received: 10/15/2020
Additional Information Requested:

- Medical
- Financial
- Other

COMMENTS: Mr. Rome was unsuccessful and doesn't intend on running again. The campaign had significant debt remaining from the candidate's personal loan, and at the close of the reporting period the campaign had just over \$600 on hand. In hindsight, they should have referred to the law directly rather than the summary. There error was compounded because the candidate moved in September 2019 and didn't update his address with the Board because he thought his campaign finance reporting obligations were complete. Mr. Rome didn't receive the Notice of Delinquency dated February 21, 2020 and didn't receive the forwarded mail until the week of April 30. They immediately begin preparing the required report, and that report was filed on May 4. Mr. Rome has since forgiven the loan, filed our final report.

OTHER LATE FEE INFORMATION

Campaign Finance:

Other Outstanding Reports: No
Other Outstanding Late Fees: No
Prior Late Fees: No
Reassessed Late Fees: No

Disclosure Statements:

Other Outstanding Late Fees: No
Prior Late Fees: No

By facsimile to 225-381-7271
Louisiana Board of Ethics
P.O. Box 4368
Baton Rouge, LA 70821

October 15, 2020

Re: Gregory Rome
Late fee assessment for November 6, 2019 Election
2019 Supplemental Campaign Finance Disclosure Report filed 76 days
late

Dear Members of the Board:

We write to request that you waive the \$600 fine that has been assessed for filing the above campaign finance disclosure report late for the reasons below.

First and most importantly, we misinterpreted the filing requirements. The Summary of the Louisiana Campaign Finance Disclosure Act on the Board's website contains the sentence "A supplemental report need not be filed if the candidate is not elected to any office and shows outstanding debts and loans or a surplus totaling less than \$2,500." We interpreted that guidance to mean that an unsuccessful candidate whose campaign had a net worth less than \$2,500 did not have to file supplemental reports because, in essence, the show was over.

We certainly met those criteria. Mr. Rome's election bid was unsuccessful, and the candidate did not intend on running again. The campaign had significant debt remaining from the candidate's personal loan, and at the close of the reporting period the campaign had just over \$600 on hand.

In hindsight, we should have referred to the law directly rather than the summary. It is clear from the text of the statute that an outstanding loan greater than \$2,500 triggers a reporting obligation, regardless of the surplus on hand.

Our error was compounded because the candidate moved in September 2019. Mr. Rome did not update his address with the Board because he thought his campaign finance reporting obligations were complete. The Board sent Mr. Rome a Notice of Delinquency dated February 21, 2020. Because of the move, he did not receive the forwarded mail until the week of April 30. We immediately had

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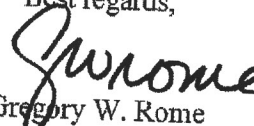
the campaign's accountant begin preparing the required report, and that report was filed on May 4, within a week of actual receipt of the notice.

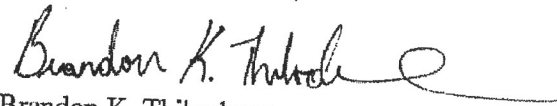
Mr. Rome has since forgiven the loan, the campaign accountant filed our final report, and Mr. Thibodeaux has dissolved the corporation that served as the candidate's campaign committee.

We ask that you waive this fine. While our failure to file was certainly a violation of the rules, it was unintentional, resulted in no harm, and was promptly corrected upon receipt of notice. Moreover, the content of the report itself raises no ethical issues or questions of any kind. The report shows no activity other than recurring bank fees. The campaign had significant campaign debt, but only in the form of a single promissory note representing personal funds the candidate loaned to his own campaign. No others were involved.

In short, we appeal to the august legal maxim of "no harm, no foul." Thank you for your consideration.

Best regards,


Gregory W. Rome


Brandon K. Thibodeaux



Unknown @Port 9100

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